

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Hadia A Ahmed

Debtor(s)

LoanCare, LLC, or its Successor or Assignee
Movant

vs.

WILLIAM C. MILLER, Esq., Trustee
Hadia A Ahmed

Respondent(s)

Chapter 13

Bankruptcy No. 19-12588-elf

**CREDITOR, LOANCARE, LLC'S RESPONSE IN OPPOSITION TO
DEBTOR'S MOTION TO VACATE ORDER GRANTING RELIEF FROM STAY**

LoanCare, LLC ("Creditor") is a secured creditor of the above Debtor and by its counsel hereby response in opposition to Debtor's Motion to Vacate Order Granting Relief from Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted, upon information and belief.
5. Admitted.
6. Denied. Creditor is without sufficient information upon which to form a belief as

to the truth of this averment, and therefore, it is denied.

7. Admitted.
8. Admitted.

9. Denied. Creditor is without sufficient information upon which to form a belief as to the truth of this averment, and therefore, it is denied. By way of further response, at the time Creditor sent a Notice of Default to Debtor, Debtor had outstanding post-petition arrears totaling \$8,120.19. *See* March 30, 2021, Notice of Default, attached as Exhibit B to Doc. 60.

10. Denied. Creditor is without sufficient information upon which to form a belief as

to the truth of this averment, and therefore, it is denied. By way of further response, Debtor's Counsel has been in contact with the office of Creditor's Counsel to confirm the amount necessary to cure Debtor's post-petition delinquency, and that information will be shared once confirmed.

11. Denied. Creditor is without sufficient information upon which to form a belief as to the truth of this averment, and therefore, it is denied. By way of further response, Debtor's Counsel has been in contact with the office of Creditor's Counsel to confirm the amount necessary to cure Debtor's post-petition delinquency, and that information will be shared once confirmed.

12. Denied. Creditor is without sufficient information upon which to form a belief as to the truth of this averment, and therefore, it is denied.

WHEREFORE, for the foregoing reasons, LoanCare, LLC requests that an Order be entered denying Debtor's Motion to Vacate Order Granting Relief from Stay and for such other and further relief as is just.

/s/ Lauren M. Moyer

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